

1 WHEREAS, on November 18, 2011, the Court issued a Clerk's Notice advancing the
2 Initial Case Management Conference to December 14, 2011 at 9:30 a.m. in the same location;

3 WHEREAS, on December 5, 2011, the Summons and Complaint in this matter were
4 placed in the United States Mail, certified, return receipt requested, by the United States
5 Marshall's Office;

6 WHEREAS, on or about December 7, 2011, Defendant BCI received the Summons and
7 Complaint in the mail;

8 WHEREAS, the Clerk's Notice regarding the advancement of the Initial Case
9 Management Conference was not served along with the Summons and Complaint.

10 WHEREAS, on December 9, 2011, Lerman & Pointer LLP was retained by BCI to
11 represent BCI in the defense of matter.

12 WHEREAS, on December 12, 2011, Karen E. Pointer of Lerman & Pointer LLP
13 checked the online docket for this matter and only then learned that an Initial Case Management
14 Conference was scheduled for December 14, 2011;

15 WHEREAS, Lerman & Pointer LLP has had insufficient time to review documents and
16 conduct an investigation into the allegations in the Complaint;

17 WHEREAS, the parties have not had an opportunity to meet and confer regarding
18 matters necessary to meaningfully participate in the Initial Case Management Conference on
19 December 14 2011, including, without limitation, initial disclosures, early settlement, ADR
20 process selection, and discovery plan;

21 WHEREAS, the parties agree that additional time is needed to complete relevant
22 investigations and meet and confer in preparation for the Initial Case Management Conference;

23 IT IS THEREFORE STIPULATED THAT the Initial Case Management Conference in
24 this matter be continued to a date convenient for the Court that is at least 60 days from the date
25 of this stipulation.
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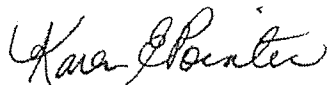
1 IT IS SO STIPULATED.

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3 Dated: December 13, 2011


Lorena Ledezma

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5
6 Dated: December 13, 2011

LERMAN & POINTER LLP

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8 By: 
Karen E. Pointer, Esq.
9 Attorneys for Defendant Blackstone Consulting,
10 Inc.

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12 PURSUANT TO STIPULATION, IT IS SO ORDERED . The case management conference is
13 continued to Feb. 17, 2012 at 1:30 p.m. Joint cmc statement due by Feb. 10, 2012.

14 Dated: December 14, 2011

15 Hon. Joseph C. Spero
16 Magistrate Judge of the United States District Court

